

MEMORANDUM

SUBJECT: Chlorpyrifos. Resubmitted data in support of an amended label for Lock-On* to include alfalfa in Arizona and California. EPA Reg. No. 62719-79. MRID No. 417390-01. DEB No. 7955. Barcode No. D164122.

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THRU: William J. Hazel, Ph.D., Acting Section Head
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TO: Dennis Edwards (PM-12)
Insecticides-Rodenticides Branch
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DowElanco has submitted additional information in support of the amended label request for Lock-On* to include alfalfa in Arizona and California, with a PHI of 4 days. The active ingredient is chlorpyrifos, O,O-Diethyl O-(3,5,6-trichloro-2-pyridyl)-phosphorothioate. The proposed label amendment was denied due to incomplete fortification data (memo, C.B. Swartz, 4/4/91, DEB No. 7627). The submission (MRID No. 417390-01) did not indicate whether green forage alfalfa or alfalfa hay had been used in the studies.

DowElanco has resubmitted the more clearly labeled fortification data tables in a letter (4/29/91) addressed to Dennis Edwards. Green forage alfalfa was fortified with chlorpyrifos at 0.5, 1, 2, and 5 ppm. Recoveries ranged from 84 to 100%, with an average of $93 \pm 5\%$ ($n = 8$). Alfalfa hay was fortified at 0.5, 1, 2, and 4 ppm. Recoveries of chlorpyrifos from hay ranged from 90 to 100%, with an average of $101 \pm 7\%$ ($n = 7$).

Alfalfa hay was fortified with the metabolite 3,5,6-Trichloro-2-pyridinol (TCP) at 1, 2, and 4 ppm. Recoveries ranged from 74 to 100% with a mean of $86 \pm 8\%$ ($n = 7$). Green forage alfalfa was not fortified with TCP, however this metabolite is no longer considered to be toxicologically significant (A. Levy, 11/29/88), and will be

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removed from the 40 CFR §180.342 tolerance expression (memo, S.H. Willet, 3/9/88).

Conclusion

The deficiency regarding fortification of green forage and cured hay alfalfa with chlorpyrifos has been resolved.

Recommendation

CBRS has no objection to the proposed label amendment for Lock-On* to include alfalfa in Arizona and California, with a 4-day PHI.

cc: CBSwartz (CBRS), Circulate (7), RF, Chlorpyrifos SF, Amended
Use File

H7509C:CBRS:CBSwartz:CM#2:Rm 800D:703-557-1877:5/3/91

RDI:WJHazel: 5/8/91

Ezager: 5/8/91

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